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December 16, 2020

**VIA ECF**

Hon. Nelson S. Román  
United States District Judge  
The Hon. Charles L. Brieant Jr.  
Federal Building and United States Courthouse  
300 Quarropas St.  
White Plains, NY 10601-4150

Re: ***CrossBorder Solutions, Inc. v. Hoy, Case No.: 7:20-cv-04877-NSR:  
Request For Leave to File Under Seal Plaintiffs' Exhibits B-J in  
Support of Plaintiffs' Motion for Leave to Amend Complaint***

Dear Judge Román:

We write on behalf of Plaintiffs CrossBorder Solutions, Inc. and Cross Border Transactions, LLC *d/b/a* CrossBorder Solutions (together, “Plaintiffs” or “CrossBorder”) to request leave to file documents under seal.

First, CrossBorder seeks to file under seal a schedule prepared by my law firm identifying over 100 CrossBorder confidential clients, marked as Exhibit J to my November 2, 2020 Declaration (“Declaration”). These are each clients that we believe Defendants unlawfully contacted, using a stolen CrossBorder client list, to solicit their business. On November 2, 2020, we produced a copy of Exhibit J—Bates stamped XBS000927-XBS000930 and marked Highly Confidential—to opposing counsel pursuant to the parties’ Stipulated Confidentiality Agreement and Protective Order (“Protective Order”). (*See* Dkt. No. 81).

Second, Exhibits B, C, D, E, H, and I to the Declaration were produced by Defendants and marked CONFIDENTIAL. Additionally, Exhibits F and G (SONG1056-1071; HOY00561-576) were produced by Defendants and marked HIGHLY CONFIDENTIAL. Pursuant to the Protective Order, CrossBorder also seeks leave to file these exhibits under seal. We respectfully request Exhibits B, C, D, E, H, and I be filed entirely under seal and that Exhibits F and G be filed with appropriate redactions to protect the names of CrossBorder clients, which are clearly visible.

Pursuant to Rule 4.A. of Your Honor’s Individual Rules of Practice in Civil Cases, Plaintiffs must identify the redactions and explain the reasons for the redactions. Here, Exhibits J, F, and G reveal confidential information by naming over 100 confidential

MEMO ENDORSED

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CrossBorder clients. CrossBorder's proposed redactions are limited to that information and we request that "only those pages containing the redacted material will be filed under seal." (See Rule 4.A.ii.).

Defendants consent to this motion.

Respectfully submitted,

/s/ Kenneth W. Taber

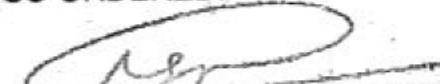
Kenneth W. Taber

cc: Wendy R. Stein, Esq. (Via ECF)  
Paul Saso, Esq. (Via ECF)  
Sharon P. Margello, Esq. (Via ECF)

Plaintiffs' letter motion (to which Defendants have consented) is GRANTED as follows: Nov. 2, 2020 Taber Declaration (ECF No. 88) Exhibits J, B, C, D, E, H, and I shall be filed entirely under seal with access restricted to case participants/parties and Exhibits F and G shall be filed with appropriate redactions to protect the names of CrossBorder clients, which are clearly visible. The Clerk of Court is directed to terminate the motion at ECF No. 84.

Dated: December 17, 2020  
White Plains, NY

**SO ORDERED:**

  
HON. NELSON S. ROMAN  
UNITED STATES DISTRICT JUDGE